

1 **SCHIAN WALKER, P.L.C.**

2 1850 NORTH CENTRAL AVENUE, #900

3 PHOENIX, ARIZONA 85004-4531

4 TELEPHONE: (602) 277-1501

5 FACSIMILE: (602) 297-9633

6 E-MAIL: [ecfdocket@swazlaw.com](mailto:ecfdocket@swazlaw.com)

7 DALE C. SCHIAN, #010445

8 SCOTT GOLDBERG #015082

9 Attorneys for Timothy H. Shaffer, Chapter 11 Trustee

10 **UNITED STATES BANKRUPTCY COURT**

11 **DISTRICT OF ARIZONA**

12 In re:

13 POTENTIAL DYNAMIX, LLC,

14 Debtor.

15 TIMOTHY H. SHAFFER, Chapter 11 Trustee,

16 Plaintiff,

17 vs.

18 AMAZON SERVICES LLC,

19 Defendant.

Case No. 2-11-bk-28944-DPC

CHAPTER 11

Adv. No. 2-13-ap-00799

**EX PARTE MOTION TO FILE UNDER  
SEAL THE TRUSTEE'S EXHIBITS TO THE  
REPLY IN SUPPORT OF MOTION TO  
PRECLUDE THE ADMISSION OF "DEEP  
DIVE" DOCUMENTS INTO EVIDENCE**

DATE: July 8, 2015

TIME: 10:00 a.m.

LOCATION: 230 North First Avenue  
Phoenix, Arizona  
Courtroom 603, 6th Floor

20 Timothy H. Shaffer, the Chapter 11 Trustee in these proceedings (the "**Trustee**"), respectfully  
21 files this motion for an order authorizing the Trustee to file under seal the exhibits (the "**Exhibits**") that  
22 support the Trustee's *Reply in Support of Motion to Preclude the Admission of "Deep Dive" Documents*  
23 *Into Evidence*. The Exhibits may contain confidential information pursuant to the *Agreed Protective*  
24 *Order* (the "**Protective Order**") [DE 316] entered by the Court on July 2, 2013. Pursuant to the  
25 Protective Order, all "confidential information," as defined therein, must be filed under seal pursuant to  
26 Rule 5.6, Local Rules of the Arizona District Court. The Protective Order further provides that this  
Motion may be filed on an *ex parte* basis, and upon shortened notice, and that no opposition to the  
Motion will be filed. In an abundance of caution, the Trustee requests authority to file the entire set of

1 Exhibits under seal pursuant to the Protective Order. A form of order approving this motion has been  
2 lodged with the Court.

3 DATED this 1st day of July, 2015.

4 SCHIAN WALKER, P.L.C.

5  
6 By /s/ SCOTT R. GOLDBERG, #015082  
7 Dale C. Schian  
8 Scott R. Goldberg  
Attorneys for the Trustee

9 COPY of the foregoing  
10 e-mailed this 1st day  
of July, 2015, to:

11 Richard M. Lorenzen, Esq.  
12 Perkins Coie, LLP  
2901 North Central Avenue, #2000  
Phoenix, Arizona 85012-2788  
13 Attorneys for Amazon Services LLC  
[rlorenzen@perkinscoie.com](mailto:rlorenzen@perkinscoie.com)

14 John S. Kaplan, Esq.  
15 Perkins Coie, LLP  
1201 Third Avenue, #4800  
Seattle, Washington 98101-3099  
16 Attorneys for Amazon Services LLC  
[jkaplan@perkinscoie.com](mailto:jkaplan@perkinscoie.com)

17  
18 /s/ DEBBI STEPHENS  
19  
20  
21  
22  
23  
24  
25  
26